

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S
OPPOSITION TO PLAINTIFF TQ DELTA, LLC'S MOTION TO STRIKE PORTIONS
OF THE NON-INFRINGEMENT REPORT AND OPINIONS OF DEFENDANTS'
EXPERT, DR. LEONARD J. CIMINI, JR. (DKT. NO. 339)**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the Expert Report of Arthur Brody, Ph.D., on Infringement of the Family 1 and Family 10 Patents by CommScope.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the Expert Rebuttal Report of Arthur Brody, Ph.D., Regarding Validity of the Family 1 Patent.

//

//

I declare under penalty of perjury that the foregoing is true and correct. Executed on
January 6, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong